

JUDGE DOW

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MAGISTRATE JUDGE
GERALDINE SOAT BROWN

UNITED STATES OF AMERICA

No. 14 CR 313

v.

Violations: Title 18, United States
Code, Sections 2251(a) and
2252A(a)(1)

KURT S. MAYER

INDICTMENT

FILED

OCT 22 2014

COUNT ONE

The SPECIAL SEPTEMBER 2014 GRAND JURY charges:

THOMAS G BRUTON
CLERK, U S DISTRICT COURT

In or about May 2014, at Schaumburg, in the Northern District of Illinois,
Eastern Division,

KURT S. MAYER,

defendant herein, knowingly and intentionally employed and used a minor, namely,
Victim A, to engage in sexually explicit conduct, namely, the lascivious exhibition of
the genitals of Victim A, for the purpose of producing a visual depiction of such
conduct, which visual depiction was produced using materials that had been mailed,
shipped, and transported in and affecting interstate and foreign commerce by any
means;

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

The SPECIAL SEPTEMBER 2014 GRAND JURY further charges:

On or about May 29, 2014, at Schaumburg, in the Northern District of Illinois, Eastern Division, and elsewhere,

KURT S. MAYER,

defendant herein, knowingly transported and caused to be transported child pornography as defined in Title 18, United States Code, Section 2256(8)(A), namely, an image of Victim A, using a means and facility of interstate commerce and in and affecting interstate commerce by any means including by computer;

In violation of Title 18, United States Code, Section 2252A(a)(1).

FORFEITURE ALLEGATION

The SPECIAL SEPTEMBER 2014 GRAND JURY alleges:

1. The allegations of this indictment are incorporated here for purposes of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.
2. As a result of his violations of Title 18, United States Code, Sections 2251(a) and 2252A(a)(1), as alleged in this indictment,

KURT S. MAYER,

defendant herein, shall forfeit to the United States any and all right, title and interest defendant has in any matter that contains visual depictions described in Title 18, United States Code, Sections 2251 and 2252A; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the said violations, including, but not limited to, the following item:

- (a) One Apple iPhone, bearing serial number C38K2Y1ADTTN.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY